DRAFT DEBRIS REMOVAL WORK PLAN
33777 VALLEY CENTER Rd
VALLEY CENTER CA 92082-6014

Prepared for:

Rincon Mushroom Corporation of America

Prepared by:
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1. INTRODUCTION

During the October, 2007 firestorm which swept through San Diego county, property along state road S-6 was completely destroyed. The property is within the boundary of the Rincon Luiseno Band of Indians reservation. At the present time, debris covers the property. This Work Plan outlines the removal process.

a. Site Description

The site is located at 33777 VALLEY CENTER Rd, VALLEY CENTER CA 92082-6014. The Assessor's Parcel Number is 33-180-0200. Figure 1 is a satellite image of the area, including Harrah's Rincon Casino. Figure 2 is an image of the site before the fire. Figure 3 is a satellite image of the site with approximate boundaries marked.. Figures 4, 5, and 6 are ground level images of the site as it was on February 13, 2008.

b. Site Ownership

The parcel is owned by Marvin Donius. It was sold to Mr. Donius by the Rincon Mushroom Corporation of America in 1999.

c. Involved Parties

Many Parties have interest in the clean-up of this site. Table 1 identifies these parties. Table 1 will be updated as needed.

TABLE 1 INTERESTED PARTIES

Agency/Company	Contact	Role
Rincon Mushroom Corporation of America	George McGill, Attorney at Law 858-481-8446	Represents Holder of a security interest.
Marvin Donius	Marvin Donius	Site Owner
Rincon Band of Indians	Richard Watenpaugh, Dir. Tribal Administration dwatenpaugh@rincontribe.org Kristie Orosco, Tribal Environmental Director epa@rincontribe.org korosco@rincontribe.org	Control of tribal lands
US EPA Region IX	Craig Benson, 562-986-6130 Benson.craig@epa.gov	Oversight of debris removal. Minimization of environmental impact.
San Diego County Hazardous Materials Unit	Nick Vent, 619-338-2217	Minimization of environmental impact on county lands.
Advanced Chemical Safety, Inc.	Neal Langerman, Ph.D. 858-874-5577	Safety, environmental consultant for Rincon

	neal@chemical-safety.com	Corporation. Proposed Project Manager for debris removal.
Envirserv	Deb Avots/Neil Frumkin, 562-427-7277	Proposed debris removal contractor
Targhee Corporation	Dave Broadbent, 562-435-8080	Environmental contractor proposed to collect soil and water samples.

d. Site Description

The site is approximately 5 acres. It is approximately 600 feet long in a North-South orientation along highway S-6 and 360 feet deep. The burned area is located in approximately the middle of the site and appears to occupy about 4 acres. An automobile impound lot is on the south side, and trucking activity is on the north side. Both of these operations are currently active.

Harrah's Rincon Casino is directly across the highway to the west. An open field containing fire debris unrelated to this site is to the east. On the south side there is approximately 2000 feet of open field ending in a flowing river. The river flows to the west.

The debris field consists of approximately 20 vehicles which were destroyed by the fire. There are five cars. The other vehicles vary in size from vans to full semi tractor-trailer rigs. Figure 7 contains photographs of all of the vehicles. Some of the vehicle debris is on bare soil, some on badly decomposed asphalt and some on concrete. The debris field also contains a large amount of metal debris, concrete, asphalt, fiberglass, and remnants of office equipment. An initial estimate of the quantity of debris which must be removed is listed in Table 2.

TABLE 2: INITIAL ESTIMATES OF DEBRIS TO BE REMOVED

Type of Debris	Estimated Quantity
Vehicle debris	160,000 lbs
Metal	60,000 lbs
Ash & Debris (Non-Hazardous)	5,000 lbs
Concrete	200,000 lbs
Asphalt	30,000 lbs
Soil (Hazardous)	800 yd^3
Non-Hazardous Aqueous Fluids	500 gallons
Gasoline	50 gallons

Other	10,000 lbs

e. Known Hazards

The known hazards will vary depending on the location on the site. Ash will contain high concentrations of heavy metals. Standing structure is a collapse hazard. Vehicles appear not to contain any fluids, but the potential is present. There are also physical hazards (i.e., slips, trips, falls) and injury from exposed glass and metals. Utilities are disconnected. There are a number of compressed gas cylinders. These appear to have vented in the fire, but each will need to be assessed.

2. PROPOSED CLEANUP PLAN

The general workflow will be organized as described in this section. Given the limited scope of the site, tasks will be controlled primarily by the on-site supervisor and the project manager.

The expected major work activities are:

- Vehicle removal and delivery to appropriate recycler
- Demolition of standing structures
- Metal removal and delivery to appropriate recycler
- Ash and loose debris removal and delivery to acceptable landfill
- Asphalt removal and delivery to acceptable landfill
- Concrete removal and delivery to appropriate recycler
- Removal of soil which was not under concrete or asphalt to a depth of 6 inches
- Management of any hazardous materials found onsite

a. Site Management

The Project Manager will be responsible for the overall workflow at the site. The Project Manager will coordinate with all subcontractors and will provide a liaison with all interested parties.

The Enviroserv Supervisor will coordinate all debris removal activity and provide for all trucks and labor. The Environserv Supervisor will prepare and maintain all shipping papers and related documents.

b. Schedule

The debris removal project is expected to require four to five days of onsite activity to remove all debris. Preliminary site activity, including pre-wetting and installation of traffic control signs will occur just prior to the debris removal activity. Soil and water samples will be collected after the debris removal is completed.

c. Dust Control

Enviroserv will take all appropriate action to minimize the spread of ash or dust and to prevent water run-off. The contractor will use water spray and/or a water truck to wet down the area.

i. Pre-wetting

The contractor will pre-wet the entire debris field 48 to 72 hours in advance of the removal. The water shall be applied in a manner so as not to generate significant runoff. Water may be applied using side spray from a water tender, hose line, or other appropriate method approved by the Project Manager

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d. Debris Load Control

The contractor will coordinate all vehicle traffic to insure the efficient movement of debris from the site to a designated facility. Debris will be managed according to the schedule in Table 3.

TABLE 3: DEBRIS MANAGEMENT

Ash & Debris	Contractor will be responsible for identifying the appropriate facility.
Demolition Debris	Contractor will be responsible for identifying the appropriate facility.
Metal Debris	Contractor will be responsible for identifying the appropriate facility.
Vehicles	Contractor will be responsible for identifying the appropriate facility.
Tires	All tires appear to have been fully consumed by the fire. Steel belt residue will be collected with the Ash and Debris.
Non-Hazardous Fluids	Fluids will be consolidated and transported to appropriate disposal site. If necessary, appropriate samples will be analyzed to properly profile the fluids.
Hazardous Waste	Approximately 50 gallons of gasoline was found in a trailer fuel tank. The gasoline will be transferred to a drum for transportation to a recycler. If other hazardous wastes are found, they will be isolated and handled as appropriate for the waste category.
Medical Waste, Unexploded Ordinance, Dead Animals, Radioactive Wastes	Not anticipated to be found. If discovered, work will be halted until appropriate changes are made to the work plan

All loads shall be wetted down before leaving the site. All loads shall be covered with a tarp; this includes metal debris. Concrete loads are exempt from a tarp provided the loads are wetted prior to leaving. If concrete loads generate dust, then the loads must be wetted and tarped.

e. Recycling

As much site debris as possible will be recycled. At a minimum, most of the metal and concrete will be recycled. Debris which cannot be recycled will be disposed of in an appropriate landfill.

f. Traffic Control

The maximum vehicle speed onsite shall be 10 miles per hour. All persons on the site shall wear a visibility vest. Site vehicle activity will be coordinated with the other two operations on the site to avoid incidents.

i. S-6

The Contractor will set up "Construction Ahead" signs 300 feet to the north and to the south of the site entrance to warn traffic of the vehicle activity.

ii. Within Site

The Contractor will make use of staging areas, safety cones, and flagmen as needed to control vehicle movement on the site.

g. Erosion Control

The site is flat, with less than one foot of elevation change in any direction across the site. Based on this, no erosion controls will be implemented during debris removal or at the completion of the removal project.

h.

3. SITE SAFETY

This site is not a hazardous waste site and site activity is not regulated by 8 CCR 5192, *Hazardous Waste Operations and Emergency Response.* With this determination, all site safety activity shall be controlled by the Construction Site Safety Standards of Cal-OSHA.

a. Air Monitoring

Use of dust suppression methods are expected to be adequate to prevent the migration of heavy metals and soot components from the site. If, in the opinion of the Project Manager, dust suppression is not effective, then one up-wind and two down wind air sampling stations will be set up on the property lines. These will collect air samples which will be analyzed on a rush basis for the California Metals. The presence of any metal in excess of the clean up goals will be taken as an indication that more aggressive dust suppression methods must be implemented. In lieu of air monitoring, the Project Manager can implement more aggressive dust suppression.

b. Other Hazard Monitoring

Other work hazards, as listed in the INTRODUCTION will be monitored visually and controlled as needed.

c. Safe Work Practices

All work activity will be done as specified by the Contractor's Safety Manual and Injury and Illness Prevention Plan. The Supervisor shall conduct a daily safety briefing.

All persons present onsite shall follow the Contractor's safety practices. If a person refuses to follow such safety practices, the Supervisor or Project Manager have the authority to remove the person from the site.

4. ENVIRONMENTAL IMPACT

a. Heavy Metals

It is known that ash and debris from structures that are consumed by wildfires contain concentrated amounts of heavy metals, such as arsenic, barium, beryllium, copper, chromium, cadmium, lead and zinc. This concentration of metals has been demonstrated in the Assessment of Burned Debris Report for the Cedar and Paradise Fires, San Diego County, California, December 2003. Based on this, soil which was not covered by concrete or asphalt may contain elevated levels of heavy metals.

b. Volatile Organic Compounds

Based on the intensity of the fire, it is expected that all volatile organic compounds burned off. However, VOC components from vehicle fluids may have penetrated soil deeply enough to avoid combustion. Based on this, soils under vehicles which were found on bare soil may contain some low level of VOCs.

c. Semi-Volatile Organic Compounds

Soot from fires contains varying levels of Polyaromatic Hydrocarbons and other Semi-Volatile Organic Compounds ("sVOCs"). These will be widespread in the construction debris and will generally be removed from the site along with debris. Based on this, bare soil may contain some level of sVOCs.

There is a well on the site. The condition of the well is unknown, but the water level is 22 feet below ground level. While fires do not usually impact well water quality, there is a potential that heavy metals, VOCs or sVOCs may have migrated into the well water.

d. Asbestos

The property owner stated that there was no asbestos on the property prior to the fire. Site inspection did not reveal any obvious sources of asbestos. Unless other information is developed, it will be assumed that the site is free of asbestos.

e.

5. ENVIRONMENTAL SAMPLING STRATEGY

All soil and water samples will be collected using standard EPA Methods and transported to the laboratory wthin 24 hours of collection. Samples will be analyzed at Bodycote Laboratory (formerly West Coast Analytical Services, Santa Fe Springs, CA). Samples will be analyzed using standard EPA methods.

Soil and water samples will be analyzed for California Metals, VOCs and sVOCs.

All soil samples will be shallow samples 6 – 12 inches below ground level. Soil samples will be obtained using either a backhoe or an auger.

Standard documentation, including a chain-of-custody will be prepared for each sample.

a. Soil Samples

i. Background samples will be collected in the fields to the north, east and south of the site. Two soil samples will be collected in each field. The approximate locations will be documented.

ii. Site soil samples will be collected where ever a vehicle was removed from bare soil. The following schedule will be used:

1. Cars and Vans 1 sample each
2. Straight trucks 2 samples each
3. Semi trailers 2 samples
4. Full tractor trailers 4 samples

iii. No soil samples will be collected from dirt under asphalt or concrete. If analysis of the soil samples above indicates that contamination from vehicles did occur, then the collection matrix above will be applied to the soil under vehicles which were burned on asphalt or concrete.

iv. Using this strategy, the estimated number of soil samples is given in Table 4.

TABLE 4: Estimated Number of Soil Samples

Location	Number of Samples
Soil Background Samples	6
Under Cars & Vans	6
Under Straight Trucks	8
Under Semi Trailers	8
Under Full Tractor – Trailers	9

b. Water Samples

i. Samples will be collected from the site well.

6. PROJECT COMPLETION

a. Cleanup Goals

The cleanup goals for site will be developed by first determining the local background for metals and then comparing those naturally occurring metals to the Cal/EPA, Department of Toxic and Substances Control, California Human Health Screening Levels (CHHSL; 2005). The CHHSL are used to evaluate the potential for soils to pose human health risk to residents. If a background metal exceeds the CHHSL metal then the cleanup goal for that specific metal will be set at two times the naturally occurring metal. The goal for all naturally occurring metals will be set at two times background. Background concentrations will be determined using public domain U.S. Environmental Protection Agency Pro UCL 4.0 software as twice the 95th percentile threshold. To assess the effectiveness of the ash and debris removal, all confirmation samples will be compared to the cleanup goals. A site will be approved if the analytical results are below the cleanup goals. If a CHHSL metal result exceeds the cleanup goal then three additional samples from the site which correspond to the locations of the highest levels of any metal in the first set of samples will be analyzed. If two of the samples exceed the goal then the property will be again excavated at the direction of the Project Manager. Once the excavation is complete additional confirmation samples will be collected. If a background metal exceeds the cleanup goal, and individual site specific determination will be made by the project engineer.

While VOCs and sVOCs will be analyzed in the site study, the data will be used for information purposes only and will not be used to certify the site as fully remediated.

The water quality samples will be compared to the Clean Drinking Water Act standards. If the well is found to be contaminated, the Project Manager, in consultation with all interested parties will determine the appropriate course of action, which may include abandoning the well.

Table 5 summarizes the soil cleanup Goals.

Table 5 provides the cleanup goals for the Rincon site.

Metal	ProUCL 4.0 Calculated Background Concentration (distribution based 95th percentile)[1]	2 x ProUCL 4.0 Calculated Background Concentration	California Human Health Screening Level for Residential Use[2]	Cleanup Goal[3]
	mg/kg			
Antimony	1.76	3.52	30	**30**
Arsenic	8.29	16.58	0.07	**16.58**
Barium	120	240	5200	**5200**
Beryllium	0.47	0.94	150	**150**
Cadmium	ND	ND	1.7	**1.7**
Chromium (total)	11.75	23.5	100,000	**100,000**

Metal	ProUCL 4.0 Calculated Background Concentration (distribution based 95th percentile)[1]	2 x ProUCL 4.0 Calculated Background Concentration	California Human Health Screening Level for Residential Use[2]	Cleanup Goal[3]
	mg/kg			
Cobalt	6.45	12.90	660	**660**
Copper	10.36	20.72	3,000	**3,000**
Lead	6.8	13.6	150	**150**
Mercury	0.033	0.066	18	**18**
Molybdenum	1.31	2.62	380	**380**
Nickel	6.15	12.30	1,600	**1,600**
Selenium	ND	ND	380	**380**
Silver	ND	ND	380	**380**
Thallium	ND	ND	5	**5**
Vanadium	55.8	111.6	530	**530**
Zinc	43.08	88.16	23,000	**23,000**

1) ProUCL 4.0 = Statistical software package used to calculate background threshold values; (ProUCL 4.0. A Statistical Software. National Exposure Research Lab, US EPA, Las Vegas Nevada, April 2007
2) California Human Health Screening Level; California Environmental Protection Agency (Cal/EPA), January 2005
3) Proposed values are taken from the Angora fire cleanup goals. These may be changed based on the results from the site specific background samples.
ND = Not detected above analytical reporting limits

b. Field Documentation

All contractors working on the site will maintain daily work logs and documentation appropriate for their tasks. At the completion of the project, copies of these documents will be given to the Project Manager for inclusion in the final site report.

c. Closure Report

The Project Manager will prepare a Closure Report, a draft of which will be reviewed by all interested parties. The final site report will be given to all interested parties and will be made publically available via the Region IX website.

7.

FIGURES & PHOTOGRAPHS

FIGURE 1: View of site prior to fire.

FIGURE 2 Close up of site prior to fire

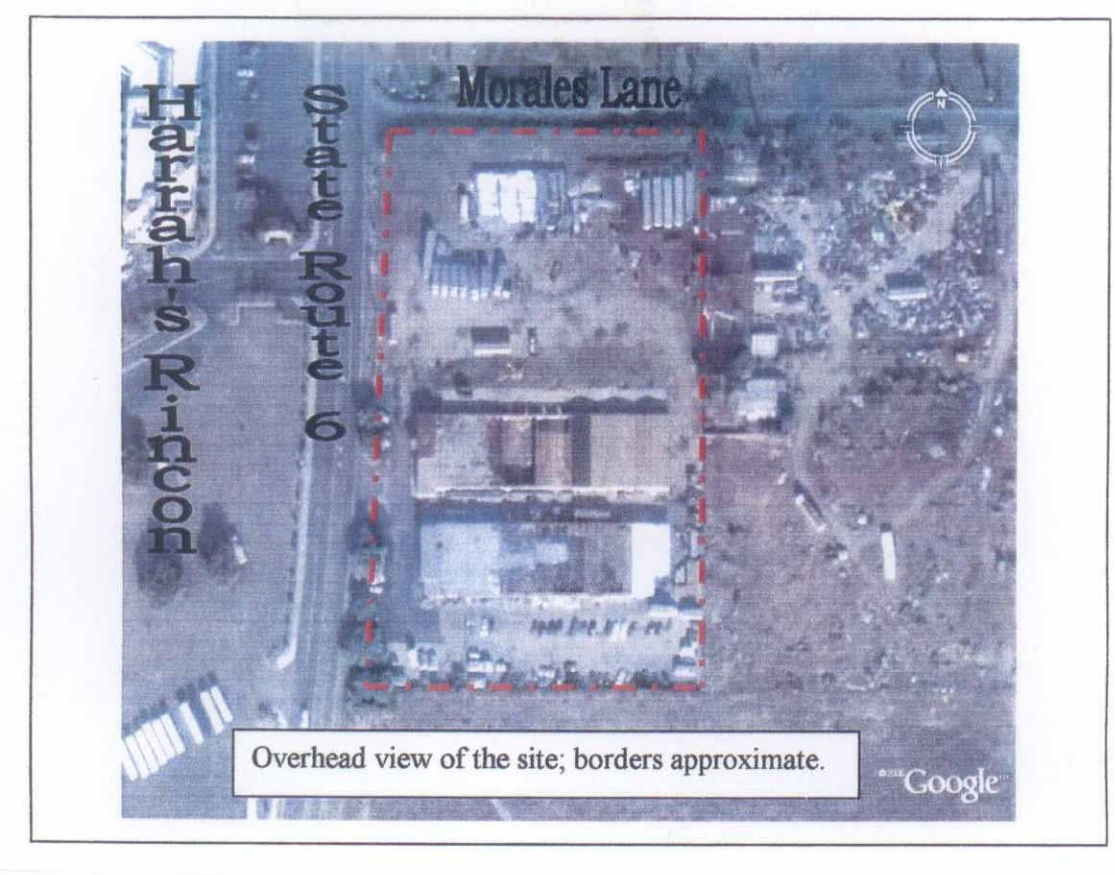

FIGURE 3: View of Site. Taken from report of David E. Robbins, dated January 18, 2008

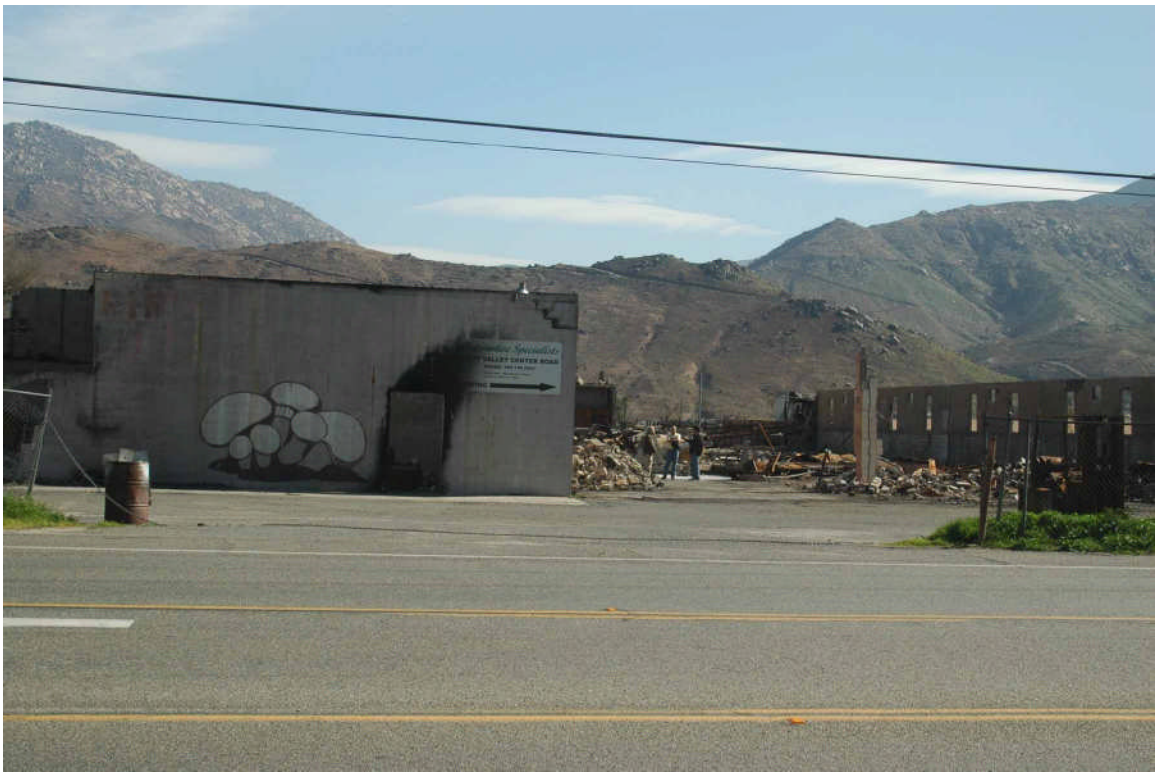

FIGURE 4 Ground view of site on February 13, 2008.

FIGURE 5 Ground view of site on February 13, 2008.

FIGURE 6 Ground view of site on February 13, 2008.














FIGURE 7 Vehicles on site as of February 13, 2008.